

AMERICAN TRUCKING ASSOCIATIONS



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FHWA-97-0278-6

Office of the Chief Counsel
Federal Highway Administration
Room 4232
400 Seventh St., SW
Washington, DC 20590

Dear Sir/Madam:

American Trucking Associations (ATA) submits these comments in response to the Notice of Proposed Rulemaking and request for comment in Federal Highway Administration (FHWA) Docket No. MC-96-5, Parts and Accessories Necessary for Safe Operation: Television Receivers and Data Display Units (61 Fed. Reg. 14733, Wednesday, April 3, 1996).

Statement of Interest

ATA, with offices at 2200 Mill Road, Alexandria, VA 22314-4677, is a federation with an affiliated association in each state and the District of Columbia. With more than 4,000 direct members, plus the members of affiliated state associations, and the members of ATA Conferences representing specialized segments of the industry, ATA, in the aggregate, represents every type and size of truck operation in the nation, for-hire and private, from the independent contractor with a single unit to the largest truck fleets.

The ATA Safety Department solicits industry views with respect to legislative and regulatory proposals, and, in regulatory matters, coordinates these views and submits comments reflecting trucking industry policy. The department has commented on many issues affected by the Federal Motor Carrier Safety Regulations (FMCSRs).

The Trucking Industry's View

ATA supports FHWA's proposal to rescind the present provisions of §393.88, Television Receivers. However, the trucking industry has certain reservations.

- o The miniaturization of television receivers has actually made it easier for an irresponsible car or truck driver to place one in a position where it can be viewed while driving. The industry can only hope that enforcement of state laws will provide adequate control.
- o A growing number of ancillary devices is competing for the driver's attention. ATA believes the agency should

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monitor the development and use of these devices to determine whether or not the driver's attention is being unduly diverted from the basic driving task and whether or not there may be a need, in the future, to impose performance standards that limit the installation of these devices.

An Overview of the Driver's Visual Task

There are growing concerns over driver workload because the driver is confronted by more and more devices that divert attention from the road ahead. Major elements of this workload already present include:

- o The increasing number of dashboard gauges to display specific vehicle operating parameters.
- o The use of digital displays for some functions.
- o An increasing use of warning lights, including those required by Federal regulations to indicate malfunctions in antilock brake systems (ABS) and emission controls.
- o The increasing number of auxiliary mirrors being used to reduce the number of blind spots around commercial vehicles.
- o Motorized mirrors which drivers will inevitably adjust while driving.
- o Broadcast receivers, CB radios, tape decks and compact disc players.
- o Rear and side obstacle detection systems including some utilizing cathode ray tube (CRT) displays which the driver must look at while maneuvering.
- o Navigational systems, some of which utilize screen displays.

ATA is aware of one study of driver distraction conducted by the National Highway Traffic Safety Administration (NHTSA). It determined that the average glance away from the road had a duration of 1.75 seconds and that it might require as many as 8 glances to complete a single monitoring task. At 60 miles per hour (88 feet per second), a driver can travel as much as 154 feet during a single glance away from the road.

The Relationship to ITS Technology

ATA has no wish to take a position that would unduly hinder the adoption of Intelligent Transportation System (ITS) technology, especially since we are well aware that many motor carriers are already successfully using specific elements of the technology.

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Nonetheless, there is growing concern over the potential proliferation of ITS-based devices, their effect on the driver's workload, and undue distraction from the basic driving task.

One specific example appears to be the navigation systems being promoted which utilize an in-dash CRT map display. Articles in the automotive media and accompanying illustrations indicate that reading these displays may divert the driver's attention from the road for an inordinate period of time. A passenger-car based demonstration of the technology at a national meeting of the Transportation Research Board (TRB) confirmed our impression.

On the other hand, we do not believe that a blanket requirement to design the equipment to allow use only when the vehicle is parked is a viable solution.

- o It would largely negate the advantage of having the equipment on board.
- o In many cases, the driver would not be able to find a safe, legal place to park in order to use the equipment.

Conclusion and Recommendation

ATA supports rescinding the present provisions of §393.88.

Nonetheless, we find that the whole issue of driver workload is only beginning to be recognized. We urge FHWA to join with others such as NHTSA, ITS America, SAE purveyors of the technology, and interested motor carriers in studies of the driver workload to assess it, determine the maximum safe level, and to determine whether or not rulemaking action may be needed in the future. We recommend that FHWA define a specific scope of work and a timetable as a part of the final action on this docket.

Respectfully submitted,



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